



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

David L. Gould, Treasurer
Citizens for Waters
555 South Flower Street, Suite 4510
Los Angeles, CA 90071

SEP 10 2002

Identification Number: C00167585

Reference: 12 Day Pre-Primary Report (1/1/02-2/13/02)

Dear Mr. Gould:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report indicates the use of calendar year-to-date figures when aggregating and reporting receipts and disbursements. Please be reminded that candidate committees are required to aggregate and report their receipts and disbursements on an election-cycle basis rather than on a calendar-year basis. Please amend your report to show election cycle-to-date figures for all aggregate amounts. (2 U.S.C. §434(b))

-Commission Regulations define the term "purpose" to mean a brief statement or description of why a disbursement was made. Examples are "dinner expense", "media", "salary", "polling", "travel", "party fees", "phone banks", "travel expenses", "travel expense reimbursement" and "catering costs". Examples of election day and voter registration activity include "exit polling", "door-to-door get out the vote", "get out the vote phone calls" and "driving voters to the polls". Unacceptable descriptions, which require additional clarification, include but are not limited to "advance", "consulting", "commission", "contract labor", "retainer", "election day expense", "expenses", "invoice", "support", "expense reimbursement", "miscellaneous", "professional services", "get-out-the-vote" and "voter registration". (11 CFR §104.3(b)(4)) Please amend Schedule B of your report to correct the descriptions which do not meet the requirements of the Regulations.

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